

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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In the Matter of the Arbitration Between: )  
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  )  
**PT SUMOHADIWIDJOJO,**                 )  
  )  
  )      C.A. NO. 0412646 NG  
Applicant                                    )  
(Respondent below)                        )  
  )  
and    )  
  )  
**BSB RESIDUAL ASSETS TRUST,**            )  
**BSB TRUST COMPANY, LTD.,** Trustee, )  
  )  
  )  
Respondent                                    )  
(Claimant below).                            )  
  )  
\_\_\_\_\_  
)

**STIPULATION**

The parties hereby stipulate, through their undersigned counsel, that Applicant shall be permitted to file a Reply in support of Applicant's Motion To Strike Or Dismiss, Or To Stay, Respondent's Purported "Counterclaim," with leave of Court if required, on or before July 8, 2005. In furtherance hereof, Applicant states that its undersigned local counsel requires a brief additional period beyond the date currently stipulated for a Reply (June 30, 2005), to complete consultation with foreign counsel concerning matters that Applicant expects to address in its Reply. The Reply would be filed at least a week in advance of the hearing on Applicant's Motion to Dismiss, etc., which hearing is scheduled for July 15, 2005.

Respectfully Submitted,

/s/ Richard S. Nicholson \_\_\_\_\_  
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Dated: June 29, 2005